

1 GLANCY PRONGAY & MURRAY LLP
Lionel Z. Glancy (#134180)
2 Marc L. Godino (#182689)
Mark S. Greenstone (#199606)
3 1925 Century Park East, Suite 2100
Los Angeles, California 90067
4 Telephone: (310) 201-9150
Facsimile: (310) 201-9160
5 Email: info@glancylaw.com
lglancy@glancylaw.com
6 mgodino@glancylaw.com
mgreenstone@glancylaw.com

7 JAURIGUE LAW GROUP
8 Michael J. Jaurigue (#208123)
Abigail A. Zelenski (#228610)
9 David Zelenski (#231768)
114 North Brand Boulevard, Suite 200
10 Glendale, California 91203
Telephone: (818) 630-7280
11 Facsimile: (888) 879-1697
Email: michael@jlglawyers.com
12 abigail@jlglawyers.com
david@jlglawyers.com

13 *Attorneys for Plaintiff An Phan*
14 [Additional Counsel Listed on Signature Page]

15 **UNITED STATES DISTRICT COURT**
16 **NORTHERN DISTRICT OF CALIFORNIA**
17 **SAN JOSE DIVISION**

18 AN PHAN, Individually and on Behalf of All
Others Similarly Situated,

19 Plaintiff,

20 v.

21 GRAND BAHAMA CRUISE LINE, LLC, a
limited-liability company; BAHAMAS
22 PARADISE CRUISE LINE, LLC, a limited-
liability company; CRUISE OPERATOR,
23 INC., d/b/a BAHAMAS PARADISE CRUISE
LINE, a corporation; and Does 1 through 50,
24 inclusive,

25 Defendants.
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Case No. 15-cv-05019-BLF

STIPULATION AND ~~PROPOSED~~
ORDER TO SET BRIEFING SCHEDULE
FOR MOTION TO DISMISS AND TO
RESCHEDULE CASE MANAGEMENT
CONFERENCE

1 Plaintiffs An Phan and Taylor Bartlett (“Plaintiffs”), and Defendants Bahamas Paradise Cruise
2 Line, LLC and Cruise Operator, Inc. (“Defendants”),¹ hereby submit the following Stipulation and
3 [Proposed] Order to Set Briefing Schedule for Motion to Dismiss and to Reschedule Case
4 Management Conference:

5 WHEREAS Plaintiffs’ Opposition to Defendants’ Motion To Dismiss Or, In The Alternative,
6 Stay The Action (“Motion”) is currently due on January 11, 2016, and Defendants’ Reply is due on
7 January 19, 2016;

8 WHEREAS the Case Management Conference in this matter is currently scheduled for
9 January 28, 2016;

10 WHEREAS Plaintiffs’ counsel have multiple depositions and dispositive motions in other
11 cases either scheduled, or to be scheduled, for the month of January, 2016; and
12

13 WHEREAS the hearing on Defendants’ Motion to Dismiss is currently set for April 7, 2016;

14 NOW THEREFORE, in the interest of efficiency and judicial economy, it is hereby stipulated
15 and agreed, subject to the Court’s approval, that:
16

- 17 1. Plaintiffs’ Opposition to Defendants’ Motion shall be due on February 19, 2016;
- 18 2. Defendants’ Reply in support of its Motion shall be due on March 17, 2016; and
- 19 3. The Case Management Conference shall be vacated and rescheduled for April 7, 2016
20 or a date thereafter as determined by the Court.
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28 ¹ 1 Defendant Grand Bahama Cruise Line, LLC has not appeared in this action.

1 DATED: January 4, 2016

Respectfully submitted,

2 GLANCY PRONGAY & MURRAY LLP

3
4 By: s/ Mark S. Greenstone

5 Lionel Z. Glancy

6 Marc L. Godino

7 Mark S. Greenstone

1925 Century Park East, Suite 2100

Los Angeles, California 90067

8 Telephone: (310) 201-9150

9 Facsimile: (310) 201-9160

Email: info@glancylaw.com

lglancy@glancylaw.com

10 mgodino@glancylaw.com

11 mgreenstone@glancylaw.com

12 JAURIGUE LAW GROUP

13 Michael J. Jaurigue

Abigail A. Zelenski

14 David Zelenski

114 North Brand Boulevard, Suite 200

Glendale, California 91203

15 Telephone: (818) 630-7280

16 Facsimile: (888) 879-1697

Email: michael@jlglawyers.com

17 abigail@jlglawyers.com

david@jlglawyers.com

18 *Attorneys for Plaintiff An Phan*

19
20
21 Dated: January 4, 2016

GREENSPOON MARDER, P.A.

22 By: s/ Jeffrey A. Backman

23 Richard W. Epstein

24 Jeffrey A. Backman

Roy Taub

200 East Broward Blvd., Suite 1800

25 Fort Lauderdale, FL 33301

26 Telephone: (954) 491-1120

Facsimile: (954) 213-0140

27 Richard.Epstein@gmlaw.com

Jeffrey.Backman@gmlaw.com

28 Roy.Taub@gmlaw.com

LAW OFFICES OF ROBERT S. BOULTER
Robert S. Boulter (SBN 153549)
1101 Fifth Avenue, Suite 235
San Rafael, California 94901-1828
Telephone: (415) 233-7100
Facsimile: (415) 233-7101
rsb@boulter-law.com

*Attorneys for Defendants Bahamas Paradise
Cruise Line, LLC and Cruise Operator, Inc.*


* * *

[PROPOSED] ORDER

Having reviewed the parties' Stipulation and [Proposed] Order to Set Briefing Schedule for Motion to Dismiss ("Motion") and to Reschedule Case Management Conference, and good cause appearing, IT IS HEREBY ORDERED THAT:

1. Plaintiffs' Opposition to Defendants' Motion shall be due on February 19, 2016;
2. Defendants' Reply in support of its Motion shall be due on March 17, 2016; and
3. The Case Management Conference shall be vacated and rescheduled for April 7, 2016 or a date thereafter as determined by the Court.

Dated: January 4, 2016


The Honorable Beth Labson Freeman
United States District Judge

**PROOF OF SERVICE VIA ELECTRONIC POSTING PURSUANT TO NORTHERN
DISTRICT OF CALIFORNIA LOCAL RULES AND LOCAL CIVIL RULE 5-1**

I, the undersigned, say:

I am a citizen of the United States and am employed in the office of a member of the Bar of this Court. I am over the age of 18 and not a party to the within action. My business address is 1925 Century Park East, Suite 2100, Los Angeles, California 90067.

On January 4, 2016, I caused to be served the following document:

**STIPULATION AND [PROPOSED] ORDER TO SET BRIEFING SCHEDULE
FOR MOTION TO DISMISS AND TO RESCHEDULE CASE MANAGEMENT
CONFERENCE**

By posting the document to the ECF Website of the United States District Court for the Northern District of California, for receipt electronically by the parties as reflected on the attached Court's Service List.

I certify under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on January 4, 2016, at Los Angeles, California.

s/ Mark S. Greenstone

Mark S. Greenstone

Mailing Information for a Case 5:15-cv-05019-BLF Phan v. Grand Bahama Cruise Line, LLC et al

Electronic Mail Notice List

The following are those who are currently on the list to receive e-mail notices for this case.

- **Jeffrey Aaron Backman**
jeffrey.backman@gmlaw.com,khia.joseph@gmlaw.com,cheryl.cochran@gmlaw.com
- **Robert Samuel Boulter**
rsb@boulter-law.com
- **Richard Wayne Epstein**
richard.epstein@gmlaw.com,maria.salgado@gmlaw.com,maite.alvarez@gmlaw.com
- **Lionel Z. Glancy**
info@glancylaw.com,lboyarsky@glancylaw.com,lglancy@glancylaw.com
- **Marc Lawrence Godino**
mgodino@glancylaw.com,info@glancylaw.com
- **Mark Samuel Greenstone**
mgreenstone@glancylaw.com
- **Michael Joe Jaurigue**
michael@jauriguelaw.com
- **Roy Taub**
roy.taub@gmlaw.com
- **Abigail Ameri Zelenski**
Abigail@jlglawyers.com
- **David Zelenski**
david@jlglawyers.com

Manual Notice List

The following is the list of attorneys who are **not** on the list to receive e-mail notices for this case (who therefore require manual noticing). You may wish to use your mouse to select and copy this list into your word processing program in order to create notices or labels for these recipients.

- (No manual recipients)